



IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

As
SFW

REPLY BRIEF FOR THE APPELLANT

Ex parte Govind MALALUR

TABLE LOOKUP MECHANISM FOR ADDRESS RESOLUTION

Serial No. 09/714,273
Appeal No.: Not yet assigned
Group Art Unit: 2164

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Atty. Docket: 058268.09059

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Encls: Reply Brief



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In re the Appellant:

Govind MALALUR

Serial Number: 09/714,273

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Filed: November 17, 2000

Examiner: AL HASHEMI, SANA A

For: TABLE LOOKUP MECHANISM FOR ADDRESS RESOLUTION

REPLY BRIEF

September 28, 2007

I. INTRODUCTION

This Reply Brief is filed in response to the Examiner's Answer dated August 1, 2007. In that Examiner's Answer, while no new grounds of rejection are made, comments and explanations are provided which are tantamount to new points of argument. This Reply Brief, therefore, is submitted to address these new points of argument, and to clarify why claims 1-15 of the pending application should be considered to be patentable over *Bechtolsheim et al.* ("*Bechtolsheim*"), U.S. Patent No. 6,829,217. Therefore, claims 1-15 should be found by this Honorable Board of Patent Appeals and Interferences to be allowable.

II. REPLY TO EXAMINER'S ANSWER

The Rejection of claims 1-15 under 35 U.S.C. 102(e) as being obvious over U.S. Patent No. 6,829,217 of Bechtolsheim et al. ("*Bechtolsheim*").

On pages 5-7 of the Examiner's Answer, the Examiner referred to the same portions of *Bechtolsheim* as those portions referred to in the Office Actions and addressed by Appellant's arguments in the Appeal Brief. Rather than effectively showing how the description of *Bechtolsheim* describes the claimed recitations, the Examiner's Answer simply repeats what *Bechtolsheim* is actually describing. Without any support, the Examiner's Answer extends the description of *Bechtolsheim* to arrive to the claimed recitations. For instance, on page 6 of the Examiner's Answer, it is submitting that "the reference is required to disclose [sip] the teaching of indexing parsed data as cited in the claim language, appellant argument regarding regenerated using a bucket portion not in the claim language, therefore the office believe the indexing as disclosed in the applied art corresponds to the claimed indexing." It appears that the Appellant's arguments are being misconstrued. In the Appeal Brief, it was indicated that the Office Action's interpretation of the description provided column 11, lines 55-60 of *Bechtolsheim* was improper. The reasons for such assertion made by the Appellant was because *Bechtolsheim*'s description is limited to avoiding incorrect flow entry access by storing a short generation number in a transmit queue associated with the packet indicating a version of the mapping used by this packet and this version of the mapping is then queued on transmit to regenerate the same

index. Appellant proceeded to submit that *Bechtolsheim* does not teach or suggest that the same index is regenerated using a bucket portion. Appellant was not indicating and did not assert that the regeneration was recited in the claims. Rather, for purposes of following the Examiner's arguments, Appellant was showing that even if *Bechtolsheim*'s description was construed to include the features recited in independent claim 1 ("parsing said data packet into an index portion and a corresponding bucket portion; indexing, directly, said index portion to said corresponding bucket portion"), such modification would not make sense in view of the description of *Bechtolsheim*. *Bechtolsheim* simply describes storing a generation number indicative of a version of mapping and using this version to regenerate the same index. There is no teaching or suggestion in *Bechtolsheim* for a person of ordinary skill in the art to arrive to the claimed recitations of independent claim 1 including an index portion and a corresponding bucket portion.

Also, the Examiner's Answer relies in column 6, lines 1-26 and the C programming language shown in this portion of *Bechtolsheim*. However, the referred portion of *Bechtolsheim* simply provides outputting an index to flow table for a designated output queue for a given input flow. *Bechtolsheim* generally refers to computing a table lookup index based on a limited range of inputs (e.g., source address and destination address) as a generic hash function novel because of the choice of both input parameters and precise hash function. However, *Bechtolsheim* is devoid of any teaching or suggestion providing, at least, "indexing, directly, said index portion to said corresponding bucket portion," and

“accessing address table information stored in an address look-up table using said bucket portion,” as recited in independent claim 1. *Bechtolsheim* appears to describe on hashing the flow identifying information contained in the packet header to reduce huge range of packet header values into a single compact field. Clearly, *Bechtolsheim* would fail to teach or suggest all the recitations of independent claim 1 and related dependent claims 2-7. For similar reasons, *Bechtolsheim* would fail to teach or suggest all the recitations of independent claim 8 and related dependent claims 9-14 and independent claim 15.

Clearly, it appears that the Examiner’s Answer, as well as previous Office Actions, is stretching the actual descriptions of *Bechtolsheim*, such as the obscure C programming code submitted in this reference using hindsight to then conclude that *Bechtolsheim* would teach or suggest, at least, “parsing said data packet into an index portion and a corresponding bucket portion; indexing, directly, said index portion to said corresponding bucket portion; and accessing address table information stored in an address look-up table using said bucket portion,” as recited in independent claim 1.

Accordingly, Appellant respectfully requests that this rejection to independent claims 1, 8, and 15 and related dependent claims be reversed.

III. CONCLUSION


As explained above, each of claims 1-15 recite one or more elements or features that are neither disclosed nor suggested in *Bechtolsheim*. Among other things, the cited reference does not provide the particular features recited in the method of independent claim 1. The office action's interpretation of *Bechtolsheim* providing such recitations of claims 1-15 is erroneous. This final rejection being in error, therefore, Appellant respectfully requests that this honorable Board of Patent Appeals and Interferences reverse the Examiner's decision in this case and indicate the allowability of application claims 1-15.

In the event that this paper is not being timely filed, the Appellant respectfully petitions for an appropriate extension of time.

Any fees for such an extension together with any additional fees which may be due with respect to this paper may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,

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